

Integrated Resource Planning (R.20-05-003)

2020 IRP Filings

Filing Requirements Overview

Background:

In accordance with Decision (D.) 18-02-018, D.19-11-016, and D.20-03-028, all Load Serving Entities (LSEs) subject to the Commission's Integrated Resource Planning (IRP) process are required to file and serve their individual IRPs with the CPUC. For the 2020 IRP Filings, they are required to do so on or before September 1, 2020.

Three Filing Requirements documents are posted on the CPUC website to assist individual LSEs in preparing their individual IRPs for Commission review. The three documents include: the Narrative Template, the Resource Data Template, and the Clean Power System (CSP) Calculator.

Each LSE should fully and accurately complete the three documents for this current IRP cycle in a way that adheres to filing requirements standards and the instructions within each of these posted documents. Failure to do so may subject the LSE to penalty under the IRP Citation Program, which is expected to be issued by staff resolution in Q2 2020.

Purpose:

This document guides LSEs and provides an overview of the Filing Requirements documents that LSEs are required to use, as well as how these documents fit together. Furthermore, it defines the key concepts for plan development and IRP filing. Finally, it instructs LSEs on how to file their plans with the CPUC.

Narrative Template:

In this document, each LSE shall describe to the Commission and interested stakeholders its plan development approach, results of analytical work, and the LSE's action plan.

Completeness of the Narrative Template will be defined by:

- Complete responses to each section.
- For the sections that are not applicable to the LSE, they should indicate "Not applicable" and provide an explanation.

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Resource Data Template:

This workbook is for reporting the LSE's existing and planned energy and capacity contracts. The LSE should review all the tabs before entering data as Commission Staff provided comprehensive instructions in the workbook itself. The LSE should complete responses with monthly energy and capacity procurement data and existing formulas (pre-written into the template) copied down all the way to the bottom of the LSE data template.

Completeness of the Resource Data Template will be defined by:

- No errors are present in the "errors" tab. This tab shows counts of how many errors appear in the data. A value of zero means that there are no errors in a given column. All numbers in this tab should be equal to zero.
- No data points requiring explanation exist in the "fillmes" tab. This tab shows the number of "fillmes" that remain in the data (i.e. the template cannot estimate a value, and requires the user to fill it out). All numbers in this tab should be equal to zero
- The total procurement displayed in the dashboard (MW and GWh) should reflect the LSE's total desired procurement—e.g. there should be no substantial numerical errors (GWh mistakenly entered as MWh) in the underlying data.
- Nonstandard entries are explained with a note.
- Please see the instructions tabs in the data template for more detail on how to fill these requirements.

Clean System Power Calculator:

This calculator tool is for the LSE to use in estimating the GHG and criteria pollutant emissions of its portfolios. Commission Staff has provided instructions for using this calculator within the document template. The LSE is required to demonstrate the use of the CSP method and calculator tool in accounting for emissions in its portfolios. The LSE is also free to use other tools to inform or supplement this accounting method. Importantly, the calculator is not intended to be used as an after-the-fact compliance tool, but rather to provide all LSEs a simple and uniform way of estimating the emissions associated with their IRP portfolios.

Completeness of the Clean System Power Calculator will be defined by:

- The LSE should input values in the yellow cells in the Demand Inputs, the Supply Inputs, and, for ESPs, the ESP GHG Benchmark tabs.

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- In the Demand Inputs tab, the Respondent enters its annual managed sales load forecast for each of the modeling years in the “Managed Retail Sales Forecast (assigned to LSE)” row that matches its IRP-assigned annual load forecast.
 - If an LSE chooses to enter a custom hourly demand shape, the shape is normalized so that the sum of the hourly values over the entire year equal 1 and the LSE provides a detailed explanation as to how their load shape was developed in the Narrative Template.
 - If an LSE chooses to specify a percentage of their baseline demand that comes from C&I loads, the percentage of C&I load does not exceed 100% and the LSE provides a detailed explanation as to how their load shape was developed in the Narrative Template.
 - If an LSE chooses to override components of their demand forecast for an Alternative Portfolio, custom demand inputs are grossed up for T&D losses before they are entered, and the LSE provides a detailed explanation as to how their alternate load modifier assumptions were developed in the Narrative Template.
- In the Supply Inputs tab, the LSE Respondent enters only supply from its contracted and planned resource portfolio where power output is delivered to (1) a California Balancing Authority area, if RPS-eligible, or (2) the CAISO system if the resource is not RPS-eligible. Other inputs in this tab must also meet the following criteria:
 - The LSE Respondent enters capacity values if “MW” is selected in the MW/GWh column, and energy values if “GWh” is selected in the MW/GWh column.
 - All entered RPS-eligible resources are RPS PCC 1 or meet the criteria to qualify as RPS PCC 1 except for the contract execution date.
 - If an LSE Respondent chooses to enter a Custom Hourly Profile for User-defined GHG-free power, the LSE does not also enter the capacity or energy for that same resource in the “Capacity Inputs” section of the tab.
 - If an LSE opted-out of its procurement obligation under D.19-11-016, or was not assigned a procurement obligation under D.19-11-016, and thus will have a certain amount of procurement occurring on their behalf, the LSE enters an amount and type of resource(s) communicated to it by Energy Division staff.
- In the ESP GHG Benchmark tab, an ESP utilizes the load forecast that has been confidentially communicated to it by Energy Division staff.

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Required and Optional Portfolios

LSEs must produce and submit at least two "Conforming Portfolios:" one that addresses the LSE's proportional share of the 46 MMT GHG target, and another that addresses the LSE's proportional share of a 38 MMT target. A definition of "Conforming Portfolio" is provided below. LSEs may study and report multiple "Conforming Portfolios" for each GHG target. LSEs are required to select two "Preferred Conforming Portfolios" among all "Conforming Portfolios" developed and submitted, one "Preferred Conforming Portfolio" for the 46 MMT GHG target, and a second "Preferred Conforming Portfolio" for the 38 MMT GHG target. LSEs should justify the selections for each GHG target, including why the portfolio is consistent with all state goals and is the best representation for how the LSE plans to meet state goals. LSE may also study and report additional "Alternative Portfolios" developed from different assumptions (including different load and load modifier assumptions) from the Reference System Plan. For all "Alternative Portfolios" developed, any deviations from the "Conforming Portfolio" must be explained and justified. If the LSE uses different load and load modifier assumptions as part of any "Alternative Portfolio" the LSE should report that information using the standard IEPR filing form templates associated with that information.

A portfolio will be qualified as a conforming one if it meets the following criteria:

1. Utilizing the LSE's assigned load forecast

A portfolio will be considered conforming if it utilizes the LSE's assigned load forecast per the guidance below:

- IOUs: 2019 IEPR, subject to changes to CCA and ESP forecasts (in the following two bullets)
- CCAs: 2019 IEPR or a different load forecast that has been approved through an ALJ Ruling finalizing load forecast and GHG benchmark
- ESPs: A load forecast confidentially communicated to each ESP individually by Energy Division staff.

2. Load shape in CSP tool

A portfolio will be considered conforming if, in the CSP tool, the total annual energy volumes remain consistent with LSE's assigned load and load-modifying resource forecast.

- An LSE may provide its own 8760 hourly shape for their customers' load and load-modifying resources as long as (1) the total annual energy volumes remain consistent with its assigned load and load-modifying resource forecast, and (2) the LSE provides a detailed explanation as to how its load shape was developed in the Narrative Template.

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3. Conforming to the LSE's 2030 GHG Emission Benchmark

A portfolio will be considered conforming if it addresses the LSE's proportional share of the GHG target.

- A conforming portfolio for the 46 MMT GHG target needs to address the LSE's proportional share of the 46 MMT GHG target, and a conforming portfolio for the 38 MMT GHG target needs to address the LSE's proportional share of a 38 MMT target.

4. Other inputs and assumptions

Uses inputs and assumptions consistent with those used by staff to develop the Reference System Portfolio, with the following exceptions based on updated information:

- If the LSE has better capital cost and financing information that more accurately reflects its situation, the LSE is free to use those inputs and/or assumptions. For example, an LSE may have its own view of future resource levelized costs and it is free to use this information to develop its portfolio. LSEs should clearly identify, and provide an explanation for, instances where it used its own assumption in lieu of the default used by staff to develop the RSP.
- Baseline resources – An LSE may have progressed with the development of resources since the formation of the baseline used in the Reference System Portfolio. The LSE is free to determine which of its resources are in its baseline when developing its portfolio, based on their latest information

5. Completing all three filing documents

A portfolio will be considered conforming if it has all three filing documents (Resource Data Template, CSP tool, and Narrative Template) completed according to completeness definition provided above.

Submission:

Please send all the three completed Filing Requirements documents to "IRPDataRequest@cpuc.ca.gov" no later than COB on September 1, 2020 and file all plans in **R.20-05-003**. Please follow the CPUC's Rules of Practice and Procedure with respect to formal filings, and please provide a courtesy copy of the filing to "IRPDataRequest@cpuc.ca.gov" via the CPUC's secure FTP application. Filers who do not already have a CPUC secure FTP account should follow the instructions on the [secure FTP site](#). From within the secure FTP application,

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users can send secure emails to CPUC staff with large attachments. This mechanism allows filers to transmit their complete IRP filing to CPUC staff including any portions deemed confidential. Additionally, LSEs should post the public versions of their IRP filings on their own websites before filing with the CPUC. When emailing their filings to the **R.20-05-003** service list, LSEs should include a hyperlink to their website where the IRP filings can be found and downloaded by interested stakeholders.

Before submitting, please change each document's file name using the following naming convention:

Narrative Template: Please change the file name using the following naming convention. The file name must contain the 2 elements below, in the order provided. Use an underscore to separate them.

1. The LSE's abbreviation, provided in the Resource Data Template's workbook in the "lse" tab
2. Version number, written as the letter "v", followed by a number. If you have to re-submit a file for any reason, increase this number by 1.

For example, an LSE assigned the abbreviation "lse", should use the name "lse_v1."

Resource Data Template & Clean System Power Calculator: Please change the file names using the following naming convention. The file name must contain the 7 elements below, in the order provided. Use an underscore to separate each element (i.e. the final file name should have six underscores in it). All letters should be in lower-case.

1. The lse's abbreviation, provided in the Resource Data Template's workbook in the "lse" tab
2. "rdt" or "csp", as appropriate. Use "rdt" for Resource Data Template and "csp" for Clean System Power tool.
3. "38mmt" or "46mmt", as appropriate, depending on the carbon target corresponding to the portfolio.
4. If portfolio is preferred, write "preferred", else write "na"
5. If portfolio is conforming, write "conforming", else write "na"
6. If portfolio is alternative, write "alternative," else write "na"
7. Version number, written as the letter "v", followed by a number. If you have to re-submit a file for any reason, increase this number by 1.

For example, LSE with the abbreviation "lse" could send the following five Resource Data Template workbooks (although, at a minimum, they are required to send the first two, a preferred conforming each for 38 and 46 MMT):

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- *lse_rdt_38mmt_preferred_conforming_na_v1.xlsx*
- *lse_rdt_46mmt_preferred_conforming_na_v1.xlsx*
- *lse_rdt_46mmt_na_conforming_na_v1.xlsx* (this portfolio is conforming, but not preferred)
- *lse_rdt_38mmt_na_na_alternative_v1.xlsx*
- *lse_rdt_46mmt_na_na_alternative_v1.xlsx*

The same LSE could send the following five outputs of Clean System Power tool (although, again at a minimum, they are required to send the first two, a preferred conforming output each for 38 and 46 MMT):

- *lse_csp_38mmt_preferred_conforming_na_v1.xlsx*
- *lse_csp_46mmt_preferred_conforming_na_v1.xlsx*
- *lse_csp_46mmt_na_conforming_na_v1.xlsx* (this portfolio is conforming, but not preferred)
- *lse_csp_38mmt_na_na_alternative_v1.xlsx*
- *lse_csp_46mmt_na_na_alternative_v1.xlsx*